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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SHANE CROMWELL,

Plaintiff,

v.

MARTIN O'MALLEY,  
Commissioner of Social Security,

Defendant.

Case No.: 2:24-cv-00064-NJK

UNOPPOSED MOTION FOR VOLUNTARY  
REMAND PURSUANT TO SENTENCE  
FOUR OF 42 U.S.C. § 405(g)

Defendant Martin O'Malley, Commissioner of Social Security ("Defendant") respectfully requests that the Court remand this action for further administrative action pursuant to section 205(g) of the Social Security Act, as amended, 42 U.S.C. section 405(g), sentence four. The purpose of the remand is to offer Plaintiff a new decision. The parties agree that no specific aspect of the Commissioner's final decision is affirmed.

On remand, the Commissioner will offer Plaintiff the opportunity for a hearing, conduct any necessary further proceedings and issue a new decision. Defendant further requests that the Clerk of

1 the Court be directed to enter a final judgment in favor of Plaintiff, and against Defendant, reversing  
2 the final decision of the Commissioner.

3 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this  
4 motion, on April 29, 2024

5  
6 Dated: May 3 2024.

7  
8 Respectfully submitted

9 JASON M. FRIERSON  
United States Attorney

10 /s/ Marcelo Illarmo  
11 MARCELO ILLARMO  
Special Assistant United States Attorney

12  
13 The Clerk's Office is  
14 INSTRUCTED to close this case.

15 IT IS SO ORDERED:

16   
UNITED STATES MAGISTRATE JUDGE

17 DATED: May 6, 2024  
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